

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

BRITISH TELECOMMUNICATIONS  
PLC and BT AMERICAS, INC.,

Plaintiffs,

v.

PALO ALTO NETWORKS, INC.,

Defendant.

C.A. No. 22-1538-CJB

**JURY TRIAL DEMANDED**

**DEFENDANT’S MOTION TO TRANSFER VENUE**

I, Luci Barry, declare as follows:

1. My name is Luci Barry. I am presently the Manager of the Research & Information center for the Silicon Valley office of Weil, Gotshal & Manges, LLP. My career as a professional librarian has spanned more than 35 years including library positions at Shea & Gould and Gibson, Dunn & Crutcher. I have held my current position for 16 years.

2. I was asked to confirm the locations of Andrew H. Gross and Jonathan D. Callas, who I understand to be co-inventors of patents asserted in the above-captioned case.

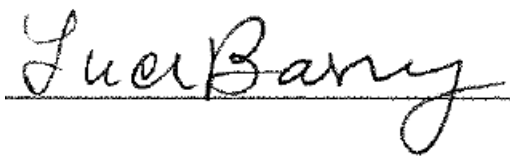
3. I confirmed that both Mr. Gross and Mr. Callas are listed on the face of the asserted patents as residing in San Jose and/or Mountain View, both cities in Santa Clara County, which is located within the Northern District of California. I also located the home addresses for Mr. Gross and Mr. Callas listed in the Oath for US7159237 (dated 3/24/2001) using the database at the PTO's Patent Center (<https://patentcenter.uspto.gov>). The Oath states that both Mr. Gross and Mr. Callas resided in San Jose as of 2001. Ex. A at 3-4.

4. I further performed database searches to confirm the current residential addresses for Mr. Gross and Mr. Callas. Specifically, I searched these names and addresses using the People Search segments of Accurint and idiCORE, two public record databases which are considered reliable and commonly used by librarians to determine residential addresses. I performed searches for Mr. Gross on December 12, 2022, and for Mr. Callas on January 5, 2023. The Accurint and idiCORE search reports provide a history of home addresses for these two individuals.

5. The search reports for Mr. Gross identified a P.O. Box in Campbell, CA, but no residential address. Ex. B at 1. I ran an additional search for Mr. Gross' spouse, and found a current residential address in Sunnyvale, CA. Ex. C at 1. Both Campbell and Sunnyvale are cities in Santa Clara County, which I understand is within the Northern District of California.

6. The search reports for Mr. Callas confirmed that he currently resides in San Jose, a city in Santa Clara County, which I understand is within the Northern District of California. Ex. D at 2; Ex. E at 1.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed this 11th day of January, 2023, in Redwood City, California.

A handwritten signature in cursive script, reading "Luci Barry", is written over a horizontal line. Below this line is another horizontal line, creating a space for a printed name.

Luci Barry